

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF
TENNESSEE NASHVILLE DIVISION**

IAN HUNTER LUCAS,)	
Plaintiff,)	Civil Action No. 3:23-cv-01359
)	
v.)	Judge Richardson/Frensley
)	
VANDERBILT UNIVERSITY et al.)	
Defendants.)	

PLAINTIFF’S MOTION FOR EMERGENCY ADJUDICATION

Plaintiff, Ian Hunter Lucas, respectfully moves this Honorable Court to adjudicate the pending Motion for Temporary Restraining Order (“TRO”) on an emergency basis to permit Plaintiff to resume his education and begin the Spring 2025 semester at Vanderbilt University School of Nursing in January 2025. In support of this motion, Plaintiff states as follows:

The pending and unanswered Motion for a Temporary Restraining Order (Doc. 10), filed on November 27, 2024, outlines in detail the irreparable harm Plaintiff continues to suffer due to Defendants’ discriminatory conduct. Time is of the essence, as Plaintiff’s ability to enroll and participate in the Spring 2025 semester, scheduled to begin in January 2025, is in jeopardy without immediate court action.

Plaintiff’s TRO motion sets forth compelling evidence of ongoing violations of the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. These violations include the denial of reasonable accommodations necessary for Plaintiff to continue his education. Defendants’ actions have caused severe and ongoing harm to Plaintiff’s education, career prospects, and emotional well-being. Despite the urgent nature of this matter, the Court has yet to issue a ruling or schedule a hearing. Without timely intervention, Plaintiff will suffer further irreparable harm that cannot be remedied through monetary

damages alone.

Plaintiff reiterates the arguments presented in his Motion for TRO, specifically:

1. Plaintiff Faces Imminent and Irreparable Harm. If the Court does not intervene immediately, Plaintiff will be unable to enroll and participate in the Spring 2025 semester, further disrupting his education, professional trajectory, and overall well-being. The harm Plaintiff faces is substantial and ongoing.

2. Plaintiff Has a Strong Likelihood of Success on the Merits. As detailed in the TRO motion, Plaintiff has demonstrated a prima facie case of discrimination, retaliation, and breach of contract. The evidence includes documented failures by Defendants to provide federally mandated accommodations.

3. The Balance of Equities Favors Plaintiff. The harm Plaintiff faces far outweighs any potential inconvenience Defendants might experience in complying with their legal obligations.

4. Public Interest Strongly Supports the Issuance of Relief. Upholding federal disability laws and ensuring equal access to education serve both Plaintiff's immediate needs and the broader public interest in enforcing civil rights protections.

For these reasons, Plaintiff respectfully requests that this Court adjudicate the pending Motion for Temporary Restraining Order (Doc. 10) on an emergency basis to allow Plaintiff to resume classes in January 2025. Specifically, Plaintiff asks the Court to issue an order requiring Defendants to provide the necessary accommodations and to facilitate Plaintiff's enrollment in the Spring 2025 semester.

Plaintiff further requests that this Court grant such other and further relief as it

deems just and proper.

Respectfully submitted,

Dated: December 6, 2024

A handwritten signature in black ink, appearing to read "Ian Hunter Lucas". The signature is written in a cursive, somewhat stylized font. The first name "Ian" is written with a large, looped 'I'. The last name "Lucas" is written with a large, looped 'L' and a trailing 'g'.

IAN HUNTER LUCAS

Plaintiff Pro Se

PMB 61, Elizabethtown, NC 28337

(910) 872-3577

ian.h.lucas@protonmail.com

CERTIFICATE OF SERVICE

I, Ian Hunter Lucas, hereby certify that on this **6th day of December, 2024**, I electronically filed the foregoing document, **Plaintiff's Motion for Emergency Adjudication**, with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to all registered participants.

Respectfully submitted,

/s/ Ian H. Lucas

Ian H. Lucas

Pro Se Plaintiff

PMB 61

Elizabethtown, NC, 28337

(910) 872-3577

Ian.h.lucas@protonmail.com

Dated: **December 6, 2024**